

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Christopher Gonzalez PRINCIPAL
A206 490 377 YOB: 1992United States District Court
Southern District of Texas
FILED

Case Number:

M-14-0314-M

FEB 17 2014

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 16, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Brezhnev Kremlin Rodriguez-Santos, citizen and national of Guatemala, and Fredy Fernelly Ruiz-Vasquez, citizen and national of Honduras, along with three (3) other undocumented aliens, for a total of five (5), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Los Ebanos, Texas to the point of arrest near Los Ebanos, Texas,

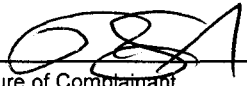
in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On February 16, 2014, Border Patrol Agent (BPA) D. Loera was conducting patrol duties in Los Ebanos, Texas. At approximately 12:20 p.m., BPA Loera responded to suspicious activity and observed a blue Ford Expedition travelling north on El Faro Rd. As the blue Ford Expedition approached the marked service unit, it quickly turned around and proceeded back south. BPA Loera drove towards the vehicle for a closer inspection and observed approximately five visible occupants. The vehicle turned near a residential area and came to an abrupt stop. The driver and passengers then exited the vehicle and attempted to flee on foot near a residential area. BPA Loera was able to identify the driver as a male wearing a black shirt and faded blue jeans. BPA J. Perez and A. Gonzalez arrived and assisted in the search for the subjects. After a thorough search of the area, six subjects were apprehended to include the male wearing the black shirt and faded jeans.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Sworn to before me and subscribed in my presence,

Ricardo Ibanez Jr. Senior Patrol Agent
Printed Name of ComplainantFebruary 17, 2014
Dateat McAllen, Texas
City and StateDorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-14-0314-M

RE: Christopher Gonzalez

A206 490 377

CONTINUATION:

The subject, later identified as Christopher GONZALEZ, stated he was a United States citizen and was found with the keys to the vehicle in his possession. The other subjects stated they were in the United States illegally and all were transported for processing. Once at the station, records checks revealed GONZALEZ was previously arrested on January 21, 2014 as the driver for a 2 on 2 Administrative Smuggling Case. He was not prosecuted at that time.

PRINCIPAL STATEMENT:

Christopher GONZALEZ was read his Miranda Rights by BPA J. Perez. GONZALEZ stated he understood his rights and was willing to provide a sworn statement without an attorney present.

GONZALEZ stated he is a United States citizen and he resides in Sullivan City, Texas. GONZALEZ stated on today's date (2/16/14), he was driving a light blue Ford Expedition and was picking up undocumented people in Los Ebanos, Texas. He stated he picked up 5 subjects and was aware they were all illegal aliens. GONZALEZ further stated he was going to be paid \$250 for picking them up and transporting them to a stash house. He then stated after picking the subjects up, he saw a Border Patrol vehicle so he made a U-turn and told them to stay in the vehicle as he ran but they all followed him. GONZALEZ concluded by stating this was the second time he has transported undocumented aliens.

MATERIAL WITNESS STATEMENTS:

Both material witnesses were read their Miranda Rights and stated they were willing to provide a sworn statement without the presence of an attorney.

1. Brezhnev Kremlin RODRIGUEZ-Santos stated he is a citizen of Guatemala and illegally entered into the United States. RODRIGUEZ stated prior to crossing into the United States, they were told a blue Ford Expedition was going to pick them up. RODRIGUEZ then stated after crossing, he and four other subjects boarded a blue Ford Expedition. RODRIGUEZ added he was the first person to get in and the driver asked him where the other people were. Once all of them were in and they drove off, the driver made a phone call and stated, "here comes the Border Patrol (slang), I'm going to abandon the vehicle." After that, the driver parked and told them to stay inside the vehicle and he ran. RODRIGUEZ stated they all ran since they also wanted to escape. RODRIGUEZ identified Christopher GONZALEZ as the driver of the vehicle.

2. Fredy Fernelly RUIZ-Vasquez stated he is a citizen of Honduras and illegally entered into the United States. RUIZ stated after entering into the United States, he boarded a blue Ford Expedition. RUIZ added the driver was young and thin and he told them to get inside. RUIZ further stated after they drove off, immigration was after them so he left them at a corner and they all ran. RUIZ had told them to stay inside but they all decided to run. RUIZ identified Christopher GONZALEZ as the driver of the vehicle.